

REMARKS

Claims 1-20 remain in this application. Claims 1-20 have been rejected. Reconsideration of this application in light of the above amendments and the following remarks is requested.

Rejection under 35 U.S.C. ' 102

Claim 1

Claim 1 recites the following:

1. A method of addressing a node in a network, comprising:
reading an identifier;
translating the identifier into a group identification representative of a plurality of identifiers;
indexing an address table with the group identification; and
mapping the group identification to a first node of the network.

Claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,240,445 to Kumar et al. ("Kumar")

The PTO provides in MPEP § 2131 that

"[t]o anticipate a claim, the reference must teach every element of the claim...."

Therefore, with respect to claim 1, to sustain this rejection the Kumar patent must contain all of the above claimed elements of the claim. However, contrary to the examiner's position that all elements are disclosed in the Kumar reference, the Kumar reference does not disclose a method of translating the identifier into a group identification representative of a plurality of identifiers, indexing an address table with the group identification, or mapping the group identification to a first node of the network.

For example, the Office Action recites the following with regard to claim 1:

Kumar teaches a method (abstract) of addressing (col. 1, line 1 – col. 4, line 10) a node (Fig. 1, #24) in a network (Fig. 1, #22), comprising:

- a. Reading (col. 6, lines 40-60) an identifier (Fig. 2, #38 and #40);
- b. Translating the identifier (Fig. 3) into a group identification representative of a plurality of identifiers (Fig. 2, #30)
- c. Indexing an address table (col. 7, lines 10-30 and 60-65) with the group identification (Fig. 7, #110); and
- d. Mapping the group identification to a first node of the network (Fig. 6).

Office Action dated May 2, 2005, page 2.

Applicants respectfully disagree. With regard to the claim limitation “translating the identifier into a group identification representative of a plurality of identifiers,” the Examiner alleges Kumar discloses such a method step in Figures 2 and 3 which show the following:

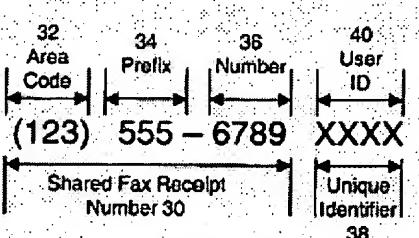


FIG. 2

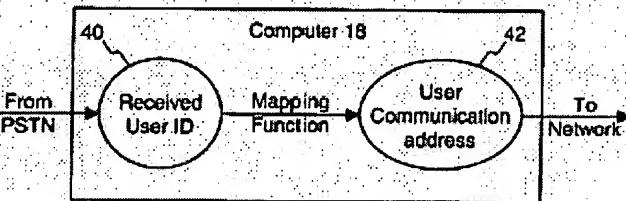


FIG. 3

As can be seen, a fax receipt number (30) is shared among a plurality of users. A unique identifier (38) is appended to the end of the shared fax receipt number (Kumar, Column 6, Lines 45-46). The unique identifier functions as a User ID (Kumar, Column 6, Lines 60-61). As shown in Figure 3, the User ID is received by a mapping function and is mapped to a user's communication address (42). Kumar clearly shows a one-to-one mapping of a user ID to a user communication address. Moreover, Kumar recites the following:

Upon receipt of the facsimile message 12, computer 18 provides notification of such reception to the intended recipient by using the unique identifier 38. In general, the *unique identifier 38 is mapped to a communication address of the intended recipient* (e.g., an e-mail, telephone, cellular, pager or other communication address or number), as stored at computer 18, and a notification message is transmitted to that address.

Kumar, Column 7, Lines 20-26 (*emphasis added*).

This may be accomplished, for example, using a *look-up table which associates each of the unique identifiers 38 with a corresponding one of a number of communication addresses of the facsimile users*. The facsimile users may then be notified of a received facsimile message by the transmission of a notification message to the appropriate facsimile user at the user's associated communication address.

Kumar, Column 7, Line 62-Column 8, Line 2 (*emphasis added*).

Computer 18 thus may include receiving circuitry for receiving a number of facsimile messages 12, *each destined for a different recipient*. Coupled to the receiving circuitry is an identification unit (described above as a mapping function, e.g., a look up table) which is configured to *associate each received facsimile message 44 with an appropriate one of the different recipients*.

Kumar, Column 8, Lines 15-21 (*emphasis added*).

FIG. 3 illustrates the mapping function provided by computer 18. In general, *the user ID 40 is received from PSTN 16 and mapped to an associated user communication address 42*. The user communication address 42 allows a notification message to be transmitted to the intended facsimile message recipient, e.g., via computer network 22.

Kumar, Column 8, Lines 39-42 (*emphasis added*).

In general, as computer 18 receives the unique identifier digits 38, look-up table 52 is accessed to provide *the user communication address associated with the unique identifier 38*.

Kumar, Column 9, Lines 9-12 (*emphasis added*).

User identification data which is also transmitted by the transmitting facsimile machine is received at the computer and, at step 110, is *mapped to the associated user communication address*.

Kumar, Column 9, Lines 38-41 (*emphasis added*).

Kumar is clear that a unique identifier is mapped to a single user communication address in a one-to-one manner. Accordingly, Kumar clearly fails to describe or suggest translating an identifier “into a group identification representative of a plurality of identifiers” as taught by the subject application and explicitly recited in the subject claim limitation. For at least this reason, Kumar fails to describe or suggest this claim 1 limitation and is insufficient to anticipate claim 1.

With regard to the claim 1 limitation of “indexing an address table with the group identification,” Applicants have already established that Kumar fails to describe or suggest the method step of translating the identifier into “a group identification representative of a plurality of identifiers.” Consequently, Kumar fails to describe or suggest indexing an address table “with the group identification,” as no such group identification is described or suggested by Kumar. For at least this reason, Kumar fails to describe or suggest this claim 1 limitation and is insufficient to anticipate claim 1.

Furthermore, the Examiner cites the following passage of Kumar as allegedly disclosing the method step of “indexing an address table with the group identification”:

...dialing sequence and has not yet started transmission of the facsimile message 12. As facsimile machine 14 completes the dialing sequence by transmitting the unique identifier 38, computer 18 *parses the unique identifier 38 and identifies the intended recipient of facsimile message 12*. Computer 18 may then transmit the required facsimile protocol tone sequence to enable facsimile machine 14 to begin transmission of facsimile message 12. Computer 18 then receives the facsimile message 12 in the conventional fashion (e.g., using a facsimile reception software package).

Upon receipt of the facsimile message 12, computer 18 provides notification of such reception to the intended recipient by using the unique identifier 38. In general, the *unique identifier 38 is mapped to a communication address of the intended recipient* (e.g., an e-mail, telephone, cellular, pager or other communication address or number), as stored at computer 18, and a notification message is transmitted to that address. The facsimile message 12 may be sent within the notification message itself, as an attachment thereto, or, preferably, it may be stored (e.g., as a web page or, more particularly, as an image viewable or otherwise accessible...

Kumar, Column 7, Lines 10-30 (*Emphasis added*).

Clearly Kumar describes a *unique* identifier that is mapped to a particular user, e.g., to a communication address of an intended recipient, and neither describes or suggests a “group identification” that is used to index an address table.

Additionally, the Examiner cites the following passage of Kumar as allegedly disclosing the method step of “indexing an address table with the group identification”

...reception station (e.g., computer 18) may be accomplished by mapping the unique identifiers 38 to associated communication addresses of the facsimile users. This may be accomplished, for example, using a look-up table which *associates each of the unique identifiers 38 with a corresponding one of a number of communication addresses...*

Kumar, Column 7, Lines 60-65 (*Emphasis added*).

In the above passage, Kumar describes indexing of a look-up table with an *unique* identifier for obtaining a corresponding communication address of a user. Kumar in no manner describes or suggests indexing an address table with a group identification that is representative of a plurality of identifiers.

Additionally, the Examiner alleges that element 110 of Figure 3 shown by Kumar discloses indexing of an address table “with the group identification.” Applicants respectfully disagree. For example, Kumar recites the following with regard to the mapping step 110 shown in Figure 7.

User identification data which is also transmitted by the transmitting facsimile machine is received at the computer and, at step 110, is *mapped to the associated user communication address.*

Kumar, Column 9, Lines 38-41 (*emphasis added*).

As noted above, the user identification data provided by Kumar is provided by a unique identifier. Thus, step 110 of Figure 7 of Kumar only shows identification data of a single user that is mapped to a communication address of the user and is wholly insufficient to describe the step of indexing an address table “with the group identification.” For at least these reasons, Kumar fails to describe or suggest the claim 1 limitation of “indexing an address table with the group identification” and is insufficient to anticipate claim 1.

With regard to the claim 1 limitation of “mapping the group identification to a first node of the network,” the Office Action alleges Figure 6 of Kumar discloses such a method step. Applicants respectfully disagree. Figure 6 of Kumar shows the following:

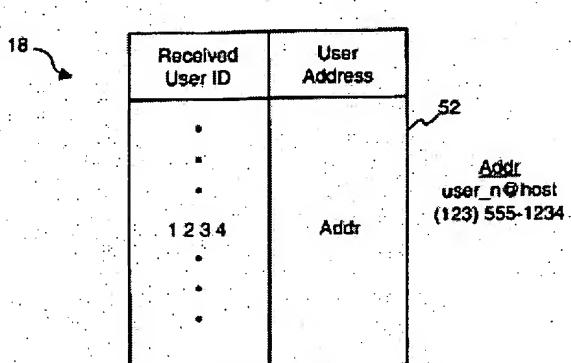


Figure 6 illustrates a look-up table (52) and a computer system. The look-up table (52) is a 2x2 grid with the following data:

| Received User ID | User Address |
|------------------|---------------------------------------|
| 1 2 3 4 | Addr user_n@host (123) 555-1234 |

Computer 18 is shown on the left, with an arrow pointing to the look-up table (52). The table is labeled '52' and the computer is labeled '18'.

FIG. 6

As can be seen, Kumar shows a look-up table (52) that provides a mapping between a received User ID to a user address. The look-up table shown by Kumar does not disclose or suggest mapping a “group identification to a first node” of a network as alleged by the Examiner. Moreover, Kumar recites the following with regard to the look-up table of Figure 6:

In general, as computer 18 receives the *unique identifier* digits 38, look-up table 52 is accessed *to provide the user communication address associated with the unique identifier 38*. Kumar, Column 9, Lines 9-12.

Thus, the look-up table disclosed by Kumar in no manner describes or suggest mapping of a “group identification to a first node.” For at least these reasons, Kumar fails to describe or suggest the claim 1 limitation of “mapping the group identification to a first node of the network” and is insufficient to anticipate claim 1.

For the reasons described above, Kumar fails to describe or suggest each limitation of claim 1 and is thus insufficient to obviate claim 1. Accordingly, Applicants request withdrawal of the rejection of claim 1 under 35 U.S.C. § 102(e) in view of Kumar.

Independent claim 8 recites similar features as claim 1 and was rejected for the same rationale as claim 1. Therefore, the same distinctions between Kumar and the claimed invention in claim 1 applies for claim 8. For the reasons described above, Kumar does not anticipate claim 8, and the rejection of claim 8 under 35 U.S.C. §102(e) in view of Kumar should be withdrawn.

Rejections Under 35 U.S.C. §103

Claims 6, 9, and 20 were rejected under 35 U.S.C. § 103(a) as being anticipated by Kumar in view of U.S. Patent No. 6,161,144 to Michels (“Michels”). Applicants traverse this rejection on the grounds that these references are defective in establishing a prima facie case of obviousness with respect to claims 6, 9, and 20.

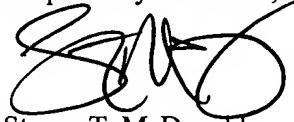
Michels does not describe or suggest any of the deficiencies of Kumar. Because claim 6 depends from claim 1 that has been demonstrated to be allowable, and claims 9 and 20 depend from claim 8 that has been demonstrated to be allowable, claims 6, 9, and 20 are allowable, at least by virtue of the dependence on an allowable base claim. Consequently, it is respectfully urged that the rejection of claims 6, 9, and 20 have been overcome, and such a notice is respectfully requested.

Conclusion

It is clear from all of the foregoing that claims 1-20 are in condition for allowance, and such a notice is respectfully requested.

The Examiner is invited to contact the undersigned at the numbers provided below if further consideration is required. Also, Deposit Account No. 08-1394 may be used for any over or under payments.

Respectfully submitted,



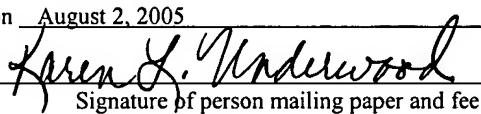
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on August 2, 2005



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